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Attorneys for Defendant CALIFORNIA SECURITY ALARMS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

YVONNE COX,)	NO. C04-02530 SI
Plaintiff,)	STIPULATION AND [PROPOSED]
vs.)	ORDER TO CONTINUE NON- EXPERT
CALIFORNIA SECURITY ALARMS, INC.,)	DISCOVERY DEADLINES
Defendants.)	TRIAL DATE: March 6, 2006

The parties to the above-entitled action jointly submit this Stipulation to extend the non-expert discovery deadline in this matter.

WHEREAS, the current non-expert discovery cutoff in this case is Tuesday, November 1, 2005, and the current date for the cutoff of expert discovery is Friday, January 20, 2006;

WHEREAS, the parties have exchanged full sets of written discovery in a timely manner, have conducted depositions of witnesses, and have set the IME for plaintiff for Monday, November 7 through Thursday, November 10;

WHEREAS, the parties desire to continue to investigate the facts and to conduct further depositions, if necessary;

WHEREAS, the parties have agreed to keep non-expert discovery open until Friday, February 3, which is 31 days before trial.

THEREFORE, the parties jointly request to extend the deadline for non-expert discovery from Tuesday, November 1, 2005 to Friday, February 3, 2006.

SIGNATURE OF COUNSEL

DATED: 11/2, 2005 By: /s/
BETH W. MORA, ESQ.
LAW OFFICES OF LUCIUS A. COOPER
Attorneys for Plaintiff

DATED: 11/2, 2005 By: /s/
H. ANN LIROFF, ESQ.
HANNIG LAW FIRM
Attorneys for Defendant
CALIFORNIA SECURITY ALARMS, INC.

FURTHER CASE MANAGEMENT ORDER

The deadline for non-expert discovery shall be moved from Tuesday, November 1, 2005 to Friday, February 3, 2006.

DATED: 11/02/05 By: _____



UNITED STATES DISTRICT JUDGE